

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS (LULAC), et al.,

Plaintiffs,

v.

GREG ABBOTT, et al.,

Defendants.

Civil Action No. 3:21-cv-259
(DCG-JES-JVB)
(consolidated cases)

UNOPPOSED MOTION TO EXTEND TIME
TO FILE REPLY IN SUPPORT OF THE UNITED STATES' MOTION TO COMPEL
PRODUCTION OF TEXAS LEGISLATIVE COUNCIL DOCUMENTS

Pursuant to Federal Rule of Civil Procedure 6(b), the United States respectfully requests that the Court extend by one week the United States' time to file a reply in support of its Motion to Compel Texas Legislative Council Documents, ECF No. 644. The United States met and conferred with the Texas Legislative Council ("TLC") regarding privilege assertions several times between October 13, 2022 and November 2, 2022. In its Response to the United States' Motion to Compel, TLC offered for the first time "to provide amended descriptions" of documents, to avoid the need for *in camera* review, TLC Response 11, ECF No. 661, and on December 5, 2022, the United States again met and conferred with TLC to discuss that offer. On December 6, 2022, TLC provided a revised privilege log, amending its document descriptions for several documents.

Good cause exists for a one-week extension of the United States' reply brief deadline, so that the United States may review the revised privilege log, consider whether TLC has established the attorney-client privilege with respect to the documents at issue, and potentially

continue to meet and confer with TLC in an attempt to narrow our areas of disagreement. The extension would make the United States' reply due on December 14, 2022. TLC does not oppose this motion and will not be prejudiced by the requested relief.

Accordingly, the United States respectfully requests that the Court grant the requested extension to file a reply memorandum in support of the Motion to Compel TLC Documents. A proposed order is attached.

Dated: December 7, 2022

ELISE C. BODDIE
Principal Deputy Assistant Attorney General
Civil Rights Division

/s/ Jasmin Lott
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CERTIFICATE OF CONFERRAL

I hereby certify that on December 6-7, 2022, counsel for the United States conferred with counsel for Texas Legislative Council concerning the subject of this motion. Counsel for Texas Legislative Council does not oppose the relief sought.

/s/ Jasmin Lott

Jasmin Lott

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CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Jasmin Lott
Jasmin Lott
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